

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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BERNARDO VALENTINI and WINDSOR	:
INTERNATIONAL INVESTMENT CO., f/k/a	:
WINDSOR INTERNATIONAL INVESTMENT	:
CORP.,	:
	:
Plaintiffs,	: Civil Action Docket
	: No. 11-CV-1355 (JMF)
	:
v.	: NOTICE OF MOTION
	:
CITIGROUP, INC., CITIGROUP GLOBAL	:
MARKETS, INC., CITICORP FINANCIAL	:
SERVICES CORPORATION, k/n/a CITI	:
INTERNATIONAL FINANCIAL SERVICES, LLC,	:
CITIBANK, N.A., and CITI PRIVATE BANK,	:
	:
Defendants.	:
	:
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PLEASE TAKE NOTICE, that upon the declaration of Dana L. Post, dated July 9, 2013, and the exhibits annexed thereto, the declaration of Lourey C. Smith, dated July 5, 2013, and the exhibits annexed thereto, and the Memorandum of Law in Support of Defendants’ Motion for Leave to Amend the Answer, defendants Citicorp Financial Services Corporation, k/n/a Citi International Financial Services, LLC, Citibank, N.A., and Citi Private Bank (“Defendants”) by and through their undersigned attorneys, Freshfields Bruckhaus Deringer US LLP, will move this Court, before the Honorable Jesse M. Furman, at the Thurgood Marshall United States Courthouse, 40 Foley Square, New York, New York, 10007, on a date and at a time to be designated by the Court, for an Order granting leave to amend Defendants’ Answer pursuant to

Federal Rule of Civil Procedure 15(a)(2).

Dated: New York, New York
July 9, 2013

FRESHFIELDS BRUCKHAUS DERINGER US LLP

By: /s/ Marshall H. Fishman

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